

Koch, Kristine

From: Carl Stivers <cstivers@anchorqea.com>
Sent: Friday, March 21, 2014 2:17 PM
To: Humphrey, Chip; Koch, Kristine
Cc: James McKenna; Amanda Shellenberger; Jennifer Woronets; Bob Wyatt
Subject: Draft List of Unresolved FS Issues

Chip –

Per your request earlier this week, we are providing a list of some of the unresolved issues in the format of general categories. Within most of these general categories there are several specific subtopics (e.g., particular PRGs). However, in many cases we feel an additional technical discussion may resolve them, so we did not list the specific nuance issues here.

COCs and PRGs

1. The identification of some COCs/PRGs based on upland source issues rather than the presence of in-river surface water, TZW or sediment risks. The LWG has additional questions of how these PRGs will be used for the FS and other purposes (e.g., by DEQ).
2. The identification of some COCs/PRGs for chemicals that have HQs<1 or cancer risks less than 10^{-6} as determined by matrix (i.e., surface water, TZW, and sediments) and RAO. Some of EPA's revisions to date have resolved this issue for some particular COCs/PRGs, but some specific issues and questions remain.
3. Selection of surface water and TZW applicable COCs/PRGs. We have not yet discussed in detail the water COCs/PRGs.
4. Issues of inconsistency with or deviating from the risk assessments for PRG calculation and application in the draft FS. Key issues include departure from risk assessment and draft FS calculation methods, benthic risk area approach, spatial scales, and spatial extent.
5. The types and ranges of upstream background and "site equilibrium" values to be used in alternatives evaluations and how they will be used. This was pushed to a later identified date (per action items list) for further discussion and resolution.

RALs and CBRAs

1. Degree of incorporation of DDx and BapEq RAL changes into the revised FS.
2. Application of the BaPEq RALs to the navigation channel.
3. Determine any need for CBRA changes and degree of incorporation of those changes into the revised FS.

We have yet to engage in discussions on the remaining issues on the FS Process Matrix, therefore they are considered "unresolved" until those discussions take place.

Please contact me if you have any questions. Thanks,

Carl

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